

CAUSE NO. _____

AMERICAN ACCESS	§	IN THE JUSTICE COURT
CASUALTY COMPANY	§	
As Subrogee of Maribel Rodriguez	§	
Plaintiff,	§	
vs.	§	PRECINCT 2
	§	
UNITED STATES POSTAL SERVICE	§	
Defendant.	§	ROCKWALL COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

Plaintiff AMERICAN ACCESS CASUALTY COMPANY As Subrogee of Maribel Rodriguez, a company which was at all times relevant to this suit authorized to transact the business of auto insurance in the State of Texas, complains of **Defendant UNITED STATES POSTAL SERVICE** and respectfully shows as follows:

A. Parties

1. **Defendant United States Postal Service** is a government entity doing business in the State of Texas. Defendant can be served with process by serving the Civil Process Clerk at the United States Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002. **Issuance of citation is requested at this time.**

2. Plaintiff seeks monetary relief of less than \$10,000.00.

B. Facts

3. On or about **June 19, 2021**, near the intersection of Southwood Drive and Southlake Drive in Rockwall, Rockwall County, Texas, a motor vehicle owned by Plaintiff's insured Maribel Rodriguez, (hereinafter "Insured") was damaged by a vehicle negligently operated by Americo Lopes. Mr. Lopes's negligence proximately caused the collision and damages in the amount of **\$6,893.33**. At the time of the accident, Americo Lopes was acting within the course and scope of employment with Defendant. Defendant is liable for the negligent conduct of its employee, Mr. Lopes, under the legal doctrine of respondeat superior. Plaintiff compensated its insured for the loss, thereby becoming subrogated to the claim herein. The total amount sought is **\$6,893.33** plus court costs.

4. Pursuant to Texas Transportation Code 601.335, it is requested that the Court, as part of its judgment, allow the parties to enter into written installment payment agreements without further order of the Court.

FOR JURY PURPOSES ONLY: If a jury trial is held, the Plaintiff requests that the Plaintiff's Insured be designated as the nominal plaintiff to avoid informing the jury of the existence of insurance.

Prayer

Plaintiff prays that Defendant be cited to answer and appear, and after final trial, Plaintiff have judgment against Defendant for a sum of **\$6,893.33** with pre-judgment and post-judgment interest, costs of suit and other relief which Plaintiff is entitled.

Respectfully submitted,

KERAMIDAS LAW FIRM

A handwritten signature in black ink, appearing to read 'T. Cass Keramidas', written over a horizontal line.

T. Cass Keramidas
State Bar No. 24027101
801 E. Campbell Road, Suite 625
Richardson, Texas 75081
(214) 299-8016 Office
(214) 299-8017 Fax
cass@keramidaslaw.com

ATTORNEYS FOR PLAINTIFF
AMERICAN ACCESS
CASUALTY COMPANY



KERAMIDAS
L A W F I R M

801 E. Campbell Rd., Suite 625
Richardson, Texas 75081
Phone 214.299.8016
Fax 214.299.8017

Michelle Jenkins
Direct phone extension 113
michelle@keramidaslaw.com

September 12, 2022

Clerk of the Court
Justice Court, Precinct 2
1111 E Yellowjacket Lane
Suite 302
Rockwall, TX 75087

VIA ELECTRONIC FILING

Re: *American Access Insurance Company as Subrogee of Maribel Rodriguez v. United States Postal Service;*
Cause No. _____
(Justice Court, Precinct 2, Rockwall County, Texas)

Dear Clerk:

Enclosed for filing, find *Plaintiff's Original Petition* in regards to the above referenced matter.

Issuance of the citation is requested at this time. Please send the citation via email to michelle@keramidaslaw.com.

If you should have any questions, please feel free to contact me directly at (214) 299-8016, ext. 113 or michelle@keramidaslaw.com.

With kind regards,

Michelle Jenkins

Enclosure as stated.